

# **EXHIBIT 3**

**From:** [Michael Murphy](#)  
**To:** [Abbe Lowell Public Outreach](#); [Zachary Hansen](#)  
**Cc:** [Bryan Sullivan](#); [Salvaty, Paul B.](#); [Kolansky, David A.](#); [Michael Murphy, Jr.](#); [Carmen](#)  
**Subject:** Re: Follow Up  
**Date:** Wednesday, September 18, 2024 8:07:47 PM  
**Attachments:** [image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Counsel:

We are going to send you the declaration the court ordered. We are not required to do anything else.

Any attempt by you to try to change or modify the court's order relating to the contents of our client's declaration which is due Friday would constitute a motion for reconsideration. And you will not be able to show good cause for the court to exercise that extraordinary remedy which is used sparingly and particularly when you had two lawyers at the hearing and had ample time to prepare and present your arguments at the hearing on these issues. (Kona Enterprises, Inc. v. Estate of Bishop (9th Cir. 2000) 229 F. 3d 877, 890.)

Finally, going forward, you are not to contact me after 5:00 p.m. on weekdays, during weekend days, and/or holidays, or while I am on vacation unless the communication is needed due to an emergency. I value the time I have to spend time with my family.

Nothing that you are raising in your two e-mails constitute an emergency. (Bhatnagar v. Surrenda Overseas Ltd. (3rd Cir. 1995) 52 F.3d 1220, 1231).

Good night!

Very truly yours,

Michael C. Murphy, Esq.

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**From:** Abbe Lowell Public Outreach <AbbeLowellPublicOutreach@winston.com>  
**Sent:** Wednesday, September 18, 2024 6:43 PM  
**To:** Michael Murphy <michael@murphlaw.net>; Abbe Lowell Public Outreach <AbbeLowellPublicOutreach@winston.com>; Zachary Hansen <zhanzen@earlysullivan.com>  
**Cc:** Bryan Sullivan <bsullivan@earlysullivan.com>; Salvaty, Paul B. <PSalvaty@winston.com>; Kolansky, David A. <DKolansky@winston.com>; Michael Murphy, Jr. <michael.jr@murphlaw.net>; Carmen <Carmen@murphlaw.net>  
**Subject:** RE: Follow Up

Tomorrow we will ask the Court to add to the declaration those two requests then.

**Abbe David Lowell**  
**Partner**

**Co-Chair, Government Investigations,  
Enforcement, and Compliance**

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**From:** Michael Murphy <michael@murphlaw.net>

**Sent:** Wednesday, September 18, 2024 9:28 PM

**To:** Abbe Lowell Public Outreach <AbbeLowellPublicOutreach@winston.com>; Zachary Hansen <zhanzen@earlysullivan.com>

**Cc:** Bryan Sullivan <bsullivan@earlysullivan.com>; Salvaty, Paul B. <PSalvaty@winston.com>; Kolansky, David A. <DKolansky@winston.com>; Michael Murphy, Jr. <michael.jr@murphlaw.net>; Carmen <Carmen@murphlaw.net>

**Subject:** Re: Follow Up

Mr. Lowell:

I am providing the declaration with the information ordered by the court. We look forward to receiving your client's full and complete Rule 26f disclosures without any more delays.

Best regards,

Michael C. Murphy, Esq.

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**From:** Abbe Lowell Public Outreach <[AbbeLowellPublicOutreach@winston.com](mailto:AbbeLowellPublicOutreach@winston.com)>

**Sent:** Wednesday, September 18, 2024 4:30 PM

**To:** Michael Murphy <[michael@murphlaw.net](mailto:michael@murphlaw.net)>; Zachary Hansen <[zhanzen@earlysullivan.com](mailto:zhanzen@earlysullivan.com)>

**Cc:** Bryan Sullivan <[bsullivan@earlysullivan.com](mailto:bsullivan@earlysullivan.com)>; Salvaty, Paul B. <[PSalvaty@winston.com](mailto:PSalvaty@winston.com)>; Kolansky, David A. <[DKolansky@winston.com](mailto:DKolansky@winston.com)>; Michael Murphy, Jr. <[michael.jr@murphlaw.net](mailto:michael.jr@murphlaw.net)>; Carmen <[Carmen@murphlaw.net](mailto:Carmen@murphlaw.net)>

**Subject:** Follow Up

Mr. Murphy,

In addition, you stated that Mr. Byrne was in Dubai on August 20 when discussions started on his deposition. Please ask him to include that in his declaration and can you let us know where he was

during Mr. Biden's deposition as well.

**Abbe David Lowell****Partner****Co-Chair, Government Investigations,  
Enforcement, and Compliance**

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**From:** Michael Murphy <[michael@murphlaw.net](mailto:michael@murphlaw.net)>

**Sent:** Tuesday, September 17, 2024 4:20 PM

**To:** Zachary Hansen <[zhansen@earlysullivan.com](mailto:zhansen@earlysullivan.com)>

**Cc:** Abbe Lowell Public Outreach <[AbbeLowellPublicOutreach@winston.com](mailto:AbbeLowellPublicOutreach@winston.com)>; Bryan Sullivan <[bsullivan@earlysullivan.com](mailto:bsullivan@earlysullivan.com)>; Salvaty, Paul B. <[PSalvaty@winston.com](mailto:PSalvaty@winston.com)>; Michael Murphy, Jr. <[michael.jr@murphlaw.net](mailto:michael.jr@murphlaw.net)>; Carmen <[Carmen@murphlaw.net](mailto:Carmen@murphlaw.net)>

**Subject:** RE: IDC Joint Statement

Hi Zachary:

I have not received a copy of the Joint Report that you were supposed to file with Judge Donahue at noon today. Where is my copy?

Very truly yours,

Michael C. Murphy, Esq.